

CENTER FOR DISABILITY ACCESS  
Mark Potter, Esq. SBN 166317  
100 Pine St., Ste 1250  
San Francisco, CA 94111  
(858) 375-7385; (888) 422-5191 fax  
Mark@potterhandy.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**Andres Gomez,**

Plaintiff,

v.

**Turnbull Wine Cellars, a**  
California Corporation;

Defendant.

Case No. 3:22-cv-00533-VC

**Declaration of Andres Gomez in  
response to Order to Show Cause**

1. I, the undersigned, am the plaintiff in this litigation. I can competently testify to the following based on my own knowledge and experience.
2. I have visual impairment and use Talkback or similar screen-reader software to navigate websites and applications on electronic devices.
3. I am an ADA advocate and tester. As part of my advocacy, I visit websites of businesses that are required to comply with the ADA and attempt to utilize the goods, services, privileges, or advantages offered by those websites, as I did in this case.
4. My claims in this case arise from my personal visit to Turnbull Wines' website on March 17, 2021, March 20, 2021, and August 2, 2021.
5. Upon attempting to view the site, I discovered the site did not function properly with my screen-reader software.

1 6. I reported my experiences to my attorney which resulted in the filing of  
2 this case.

3 7. I understand my obligations to have standing to bring claims in this court.  
4 I have personal knowledge of barriers I've complained of based upon my  
5 visit. I understand that once the case concludes and the barriers are  
6 removed that I must intend to return to the website in order for this court  
7 to have jurisdiction to hear my claims.

8 8. I intend to return to the website at least once after I have been made aware  
9 that all barriers have been removed and after the conclusion of the case  
10 to test the adequacy of any remedial measures that are taken. I am  
11 deterred from returning until this occurs.

12  
13 I declare, under penalty of perjury of the laws of the United States, that the  
14 foregoing is true and accurate.

15  
16 Dated: May 10, 2022

17  
18 By: Andres Gomez  
19 Andres Gomez  
20 9AE8FDA50EF78ABB21B35680A30A75A9 ready**sign**